

I have been watching the information and reading as much as I can on the potentially offering of Broadband Over Powerline technology. Recently the NTIA report was also released with another interesting impact. For all the information I have reviewed to date, I have come to the conclusion that BPL is not ready for mainstream use.

Personally, I hold the position of ARRL EC for my local county. In addition, I am a Red Cross volunteer and in my employment I work in the communications technology industry as a consultant. I am routinely training volunteers to make use of their equipment in the event of need.

From all indications and from the materials/information I have learned that there is a real fear of BPL. Even the NTIA has said that Part 15 rules can not effectively be used to measure the interference presented to low band users under 80 Mhz. Changing the means of measurement to allow for approval of BPL seem quite counter productive to FCC rules/procedures. While accepting the premise that filtering will offer some level of protection, the FCC is fully aware of problems already presented by electric utilities related to mitigation of interference.

If BPL is to be allowed under Part 15.5(a) and 15.5(b) then harmful interference to licensed services is not acceptable. Your engineers understand the ramifications of signal mixing and the results of raising the noise floor especially in low band radiation that easily can be carried hundreds of miles. Further, the utilities placing this technology into service will be plagued by licensed operators which will result in a situation where the FCC may have to rule against an already accepted device. This will be making a mockery of Part 15. As a reminder, Part 15 devices are unlicensed.

I applaud the FCC in pushing for more broadband access but there are much less expensive and proven non-interference creating methods available. Broadband wireless in the 2.4 and 5.8 GHz bands are popping up while the cell phone and PSC providers are quickly bringing Internet to the masses while the phone company promises fall on dry ground.

In the world we now live in it is extremely important that the use of frequencies below 80 MHz remain uninhibited and available in the event of need. FEMA, SHARES and amateur radio is licensed to use emissions in this area of the spectrum. Approving BPL (a maker of man-made interference does not ring with the best use of the spectrum. Please consider non-approval of BPL using these frequencies.

Sincerely Submitted,
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